

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

GLOBAL FORCE)	
ENTERTAINMENT, INC. and)	
JEFFREY JARRETT)	
)	CIVIL ACTION NO. 3:18-cv-00749
Plaintiffs/Counter-Defendants,)	
)	CHIEF JUDGE CRENSHAW
v.)	MAGISTRATE BARBARA D. HOLMES
)	
ANTHEM WRESTLING)	JURY DEMAND
EXHIBITIONS, LLC,)	
)	
Defendant/Counter-Plaintiff.)	

PLAINTIFFS' FIRST MOTION IN LIMINE

Plaintiffs Global Force Entertainment, Inc. and Jeffery Jarrett ("Plaintiffs") respectfully move to exclude and preclude Defendant from offering evidence, by introduction, reference, documents, declaration, deposition testimony, or live testimony, of any information related to Mr. Jarrett's conduct while intoxicated resulting from his alcoholism.

Mr. Jarrett is an alcoholic in recovery. It is undisputed that Mr. Jarrett's conduct while intoxicated resulted in his suspension from his employment by Defendant. Defendant also asserts Mr. Jarrett's conduct while intoxicated resulted in the termination of his employment by Defendant. Plaintiffs do not seek to prohibit Plaintiffs or Defendant from mentioning Mr. Jarrett's suspension and termination generally or any general, non-specific reference to Mr. Jarrett's battle with alcoholism. Presenting any more than that at trial is unnecessary and unwarranted. Mr. Jarrett's alleged conduct (including any statements made) while intoxicated are not relevant; are highly prejudicial; and seek to introduce hearsay outside any exception.

Wherefore, Plaintiffs respectfully request the Court: (1) exclude and preclude Defendant from offering evidence, by introduction, reference, documents, declaration, deposition testimony, or live testimony, of any information related to (1) Mr. Jarrett's conduct and/or statement while he was intoxicated; (2) any inflammatory and/or pejorative statements regarding Mr. Jarrett resulting from any intoxicated conduct; (3) any out-of-court statements made by any third party to Mr. Nordholm, Mr. Asper, Mr. D'Amore, or any other individual regarding Mr. Jarrett's conduct while intoxicated; and (5) such other and further relief that the Court may deem just and proper under the circumstances.

Counsel for Plaintiffs has conferred with all other counsel via email on June 4, 2020. Defendant informed Plaintiffs that it opposed this motion.

Dated: June 5, 2020

Respectfully submitted,

/s/ Samuel F. Miller

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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of June 2020, the foregoing document was filed via ECF:

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/s/ Samuel F. Miller
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